

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
COLUMBIA DIVISION

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U. S. DISTRICT COURT  
MID. DIST. TENN.

ROBERT ZENAS WHIPPLE, III

Plaintiff,

v.

DERRICK SCHOFIELD, et al.

Defendants.

CASE NO. 1:13-cv-00109

CHIEF JUDGE HAYNES

JURY DEMAND

**PLAINTIFF'S MOTION TO REINSTATE DEBRA JOHNSON AS DEFENDANT**


Comes now the plaintiff and moves to reinstate Debra Johnson as a defendant in this suit.

As grounds for this motion, plaintiff avers:

1. On May 30, 2014, Plaintiff was threatened with retaliation by Ms. Johnson for engaging in protected conduct (*see* ¶ 2, Exhibit A, *Declaration in Support...*).
2. Plaintiff dismissed Ms. Johnson with the express intent of avoiding retaliation (*Id.* ¶ 4).
3. Ms. Johnson retaliated against the plaintiff by having false disciplinary charges filed against him and removing him from his program assignment, contrary to written policies and procedures (*Id.* ¶¶ 5—9).
4. In Plaintiff's motion to dismiss (Docket Entry No. 213), he specifically requested "leave to reinstate Ms. Johnson as defendant should she retaliate in any way."

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 25<sup>th</sup> day of June, 2014



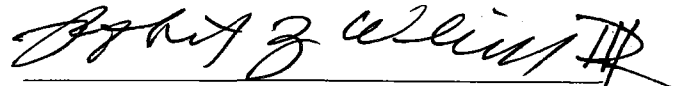
Robert Z. Whipple, III #399615  
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**CERTIFICATE OF SERVICE**

Plaintiff hereby certifies that a copy of the foregoing document has been placed in the U.S. Mail, first class postage prepaid, to the following:

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Robert Z. Whipple, III #399615  
Plaintiff, *pro se*